

15 *cont  
sub  
ex* image information outputted from said imaging device is  
stored on the second memory;  
a reproduction device to receive and reproduce image  
information stored on and outputted from one of the first  
memory and the second memory; and  
20 a second changer to selectively change between a third  
condition, in which image information stored on said  
first memory is output from said first memory to the  
reproduction device for reproduction, and a fourth  
condition, in which image information stored on said  
25 second memory is output from said second memory to the  
reproduction device for reproduction.

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#### REMARKS

Claims 20-25 and 31-46 are pending in this matter. By this Amendment, Applicants are submitting amendments to Claims 20 and 40 to clarify and better define the claimed invention. No new matter is added by this Amendment.

The Examiner has rejected:

(a) Claims 20-25, 33, 35, 38, 39, 40-46 under 35 U.S.C. § 103 as being unpatentable over Orii (U.S. Patent 5,200,863) in view of Sasaki (U.S. Patent 5,034,804) and in further view of Takahashi (U.S. Patent 5,067,029);

(b) Claims 34 and 36 under 35 U.S.C. § 103 as being unpatentable over Orii in view of Sasaki and in further view of Finelli (U.S. Patent 4,937,676);

(c) Claims 31 and 37 under 35 U.S.C. § 103 as being unpatentable over Lang (U.S. Patent 4,963,995) in view of Sasaki; and

(d) Claim 32 under 35 U.S.C. § 103 as being unpatentable over Lang in view of Sasaki and in further view of Watanabe (U.S. Patent 5,032,927).

Applicants respectfully traverse each of the above rejections.

In regard to Claims 20 and 43, the present invention is directed to a camera which provides, generally, the ability to automatically and/or selectively store image information to a first semiconductor memory or a second semiconductor memory.

The Examiner requested Applicants to point out that portion of the drawings and/or the Specification which supports the claimed inventions of Claims 20, 40, and 43. At least one embodiment is set forth in Figure 16B and described at page 45, lines 3-9 of the Specification, as set forth here:

When the above exposure process has been completed, the routine checks whether a card flag is set to the value "1" in step #409. If the value is "1" (Yes in step #409), the image signal read into CCD 401 is written on the IC card 2 mounted in the camera (#411). If the value is "0", the image signal read into CCD 401 is written into the internal memory 405 of the camera 1 (#410).

(emphasis added)

As provided above, the Examiner combines the Orii reference with the teachings of both Sasaki and Takahashi to render the claimed inventions obvious. Orii is directed to an image data recording system consisting of a camera (10) and an electrically coupled video tape recorder (25). Camera (10) receives a semiconductor memory card (24), and video tape recorder (25) receives a magnetic storage medium (26a). Unlike Applicants' claimed inventions, the Orii reference teaches that any information stored in magnetic storage medium (26a) is derived from semiconductor member (24). Specifically, from column 4, lines 39-44, Orii provides:

The above-described video tape recorder 25, when connected to the output terminal 19, magnetically records the image signals derived from the memory card 24 of the camera apparatus 10 on a magnetic cassette tape 26 for permanent or long term or short term storage of the image signals corresponding to the images.

(emphasis added) (see also column 13, lines 9-12).

Consequently, Orii fails to teach that either of the storage mediums may be automatically or independently selected to receive image information outputted from an imaging device.

The Sasaki reference discloses camera (10) which stores image information on card memory (15). The Examiner found "it is obvious to one of ordinary skill in the art to modify Orii with Sasaki by providing the apparatus of Orii with the semiconductor memory of SRAM kind as disclosed by Sasaki et al as an alternative first memory of Orii apparatus in order to reduce the size of the overall apparatus." (Office Action, page 4, line 22 through page 5, line 4). Applicants respectfully disagree that Sasaki furthers the teachings of Orii, as Orii already includes teachings of a semiconductor memory, or memory card (24).

The Orii reference expressly provides a semiconductor memory for the receipt and storage of image data at the level of the camera and a non-semiconductor memory for "permanent or long term or short term storage" (col. 4, lines 43, 44) of image signals from memory card (24). Although the Orii reference includes alternative configurations for each memory individually, it fails to teach or suggest use of a semiconductor memory in place of magnetic storage medium 26a.

One of the tenets which must be followed when applying 35 U.S.C. § 103 is that a reference relied upon must be considered as a whole and must suggest the desirability and thus the obviousness of making a particular combination. MPEP § 2141. Applicants respectfully submit that the failure of Orii (which, in this case,

discloses both semiconductor memories and non-semiconductor memories) to disclose, teach, or suggest the interchangeability of semiconductor and non-semiconductor memories is express evidence that no motivation or suggestion of desirability may be found in the reference for that asserted by the Examiner.

For combination with Orit and Sasaki, the Examiner further cites Takahashi as teaching a camera apparatus having a plurality of differing memories which are provided in a camera housing. The memory types include semiconductor memory 40, magnetic recording unit 50, and optical recording unit 30. The differing memories of Takahashi are provided for different operational scenarios. Consequently, the provision of a camera with only like memory types (e.g., semiconductor and semiconductor, optical disc and optical disc, etc.) is counter to the express and implicit teachings of Takahashi. Thus, Takahashi fails to include any disclosure, teaching, or suggestion of a camera or image generating system which incorporates a plurality of semiconductor memories for image data storage.

Orit, alone or in combination with Sasaki and/or Takahashi, does not disclose, teach or suggest the claimed invention. Further, Applicants respectfully submit no motivation exists for the combination of these references, as well, there exists no evidence that one having ordinary skill in the art could reasonably combine these references to derive the present invention nor render it obvious.

The above discussion is equally applied to the claims which properly depend from Claims 20 and 43.

In regard to Claims 23, 38, and 40, the present invention is directed to a camera which provides, generally, the ability to selectively direct image information stored within a first memory or within a second memory to a reproduction device.

Orii teaches of a system which includes two discrete, connectable portions. While each portion in itself maintains an output device, for example, liquid crystal display 23 (camera [10]) and monitor (27) (video tape recorder [25]), Orii is silent to the concept of a single output device selectively supporting multiple memory storage devices.

The Examiner has responded that,

using a reproducing device (monitor) for reproducing the recorded image information for viewing is well known in the art therefore it would have been obvious to one of ordinary skill in the art to supply the reproduced image information from the first semiconductor memory to the monitor which supply with the reproduced image information from second semiconductor for selectively viewing.

(Office Action, page 9, lines 14-20).

Applicants respectfully submit, however, that the present invention does not attempt to claim the broad concept of utilizing a reproducing device. Rather, Claim 23 particularly requires,

a changer for selectively changing between a first condition, in which image information on the first memory is outputted to the first reproduction device, and a second condition, in which image information on the second memory is outputted to the first reproduction device.

Sasaki and Takahashi fail to disclose, teach, or suggest that which would overcome the deficiencies of Orii. Specifically, Sasaki teaches of display (107)

which is coupled to and receives image information from memory card (15) alone. Takahashi does not substantively speak of a reproduction device; moreover, Takahashi is silent to the concept of a reproduction device which selectively supports two storage media.

Accordingly, Orii, alone or in combination with Sasaki and/or Takahashi, does not disclose, teach, or suggest the claimed invention. Further, Applicants respectfully submit one having ordinary skill in the art could not reasonably combine these references to derive the present invention nor render it obvious.

The above discussion is equally applied to the more specifically claimed invention of amended Claim 38 and the appropriate portions of amended Claim 40 as well as the respective depending claims of Claims 23, 38, and 40.

In regard to Claims 34 and 36, the Examiner combines the teachings of Orii and Sasaki with Finelli. Finelli is cited as teaching a camera having a printing device. While an integral printing device is included within the Finelli camera, Applicants respectfully submit that Finelli fails to contribute that which would overcome the noted deficiencies set forth above. Specifically, Finelli is silent with regard to a changer for automatically and selectively changing between a first or a second semiconductor memory for data storage (Claim 20) or a changer for selectively directing the output from a first or a second memory device to a reproduction device (Claim 23).

In regard to Claim 31, the present invention is directed to an editing device which provides, generally, a first reception unit, which receives a removable memory card; a second reception unit, which receives an optical

disc; a signal processor to restore processed image information stored on the memory card to original image information; and a recorder to record the original image information on the optical disc. The Examiner rejects the invention of Claim 31 over the Lang reference in combination with Sasaki.

The Lang reference is directed to a device capable of transferring original data from a first storage medium to a second storage medium. The Examiner finds that Lang discloses a first reception unit capable of receiving "a memory" and a second reception unit capable of receiving an optical disc.

Applicants respectfully submit that the Examiner's findings are not drawn to the claimed invention, as Claim 31 requires a "first reception unit for receiving a removable memory card." Cited memory (13) of Lang is a fixed semiconductor memory and, in deference to the Examiner's findings regarding reception unit (11) for an optical disc, cannot be considered either removable or received by a "reception unit" in accordance with the claimed invention. Thus, Applicants submit Lang fails to disclose, teach, or suggest the required number of reception units. Further, Lang does not disclose, teach, or suggest a signal processor to restore processed image information stored on a storage medium removably received in a first reception unit.

The Examiner relies upon Sasaki for the generalized teachings of removable memory cards. However, as provided above, even if fixed memory (13) of Lang were interchangeable with a conventional memory card (for example, memory card (15) of Sasaki), neither Lang nor Sasaki provide for a second reception unit.

Lang, alone or in combination with Sasaki, does not disclose, teach or suggest the claimed invention. Further, Applicants respectfully submit one having ordinary skill in the art could not reasonably combine these references, whether as cited or with any other known reference, to derive the present invention nor render it obvious.

There is some suggestion in the Examiner's findings at page 7 of the Office Action that in addition to the "first reception unit" found within Lang, that Sasaki includes a reception unit which could be combined with the cited one or more reception units of Lang to render obvious the present invention. In addition to the requirement that the Examiner must consider cited references as a whole, and the cited references must include a suggestion of desirability and thus obviousness of making a particular combination, it is respectfully submitted that the Examiner must also abide by the following: the references must be viewed without the benefit of impermissible hindsight vision afforded by the claimed invention. MPEP § 2141. Applicants respectfully submit that the Examiner's dissection and combination of only portions of the Lang and Sasaki references without motivation therefrom, but from the Applicants' claimed inventions alone, is impermissible.

The above discussion is equally applied to the claims which depend from Claim 31.

In regard to the rejection of Claim 32, Applicants respectfully submit that neither the specific compression algorithm disclosed within Watanabe nor its other teachings contribute that which would overcome the shortcomings of the combined Lang and Sasaki references.



Applicants respectfully submit Claims 20-25 and 31-46 are patentably distinct over the cited references and this application is considered to be in condition for allowance. Applicants respectfully request Examiner's reconsideration of this matter in light of this Amendment and withdrawal of all Section 103 rejections.

This Amendment does not result in an increase in either the number of independent claims or the total number of claims, and does not present any multiple dependency claim. Accordingly, no fee based on the number or type of claims is incurred by this Amendment. However, if a fee were to be required, please charge any fee (other than an issue fee) required during the pendency of this U.S. patent application to Deposit Account 18-1260.

Respectfully submitted,



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